

EXHIBIT 115

Declaration of Richard Williams

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF NORTH CAROLINA
CASE NO. 1:14-CV-954**

**STUDENTS FOR FAIR
ADMISSIONS, INC.,**

Plaintiff,

v.

**UNIVERSITY OF NORTH
CAROLINA et al.,**

Defendants.

DECLARATION OF RICHARD (“STICK”) WILLIAMS

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I, Richard ("Stick") Williams, hereby make this declaration from my personal knowledge and, if called to testify to these facts, could and would do so competently:

Background, Leadership Experience, and Honors

1. I am a Black male.
2. I was born in the Ray Warren Homes housing project in Greensboro, North Carolina. My single mother raised me and my two brothers.
3. I graduated from Dudley High School, a low-resourced, all-Black school in Greensboro.
4. With an academic scholarship to attend The University of North Carolina at Chapel Hill ("UNC-Chapel Hill"), I became the first person in my family to go to college. I studied Accounting and graduated with a Bachelor of Science from UNC-Chapel Hill in 1975.
5. Immediately after graduating, I went to work for Duke Power Company as an internal auditor. I later worked for Arthur Andersen & Company before returning to Duke Energy Corporation ("Duke Energy") in 1979. I worked for Duke Energy for 37 years. Most recently, I served as Vice President of Corporate Community Affairs and President of the Duke Energy Foundation. Previously, I served as Vice President of Diversity, Ethics, and Compliance. I retired in December 2015.
6. I served on the UNC-Chapel Hill Board of Trustees ("BOT") from 1999 to 2007. In 2003, I was the first African-American individual elected to serve as Chair of the BOT. Prior to my service on the BOT, I was the first African-American Chair of the

UNC-Chapel Hill General Alumni Association Board of Directors. I also have served as the Chair of the UNC-Chapel Hill Board of Visitors, as a trustee of the UNC-Chapel Hill Foundation, as a member of the Chancellor's Advisory Committee on the Sonja Haynes Stone Center for Black Culture and History, and as a member of the search committee that recommended James Moeser as Chancellor.

7. I am a Co-Chair of Project Leadership & Investment For Transformation ("Project LIFT"), a philanthropic initiative to improve educational opportunities for traditionally underserved students in the Charlotte-Mecklenburg school system.

8. In addition, I have served as a trustee of Brevard College and have held leadership positions with Communities in Schools of North Carolina, an organization dedicated to surrounding students with a community of support, empowering them to say in school and achieve in life, and with the North Carolina Mentoring Council. I am a past Chair of the Boards of Directors for the Durham and Chapel Hill-Carrboro Chamber of Commerce, the Greater Triangle Regional Council, the Triangle Community Foundation, the Charlotte Mecklenburg Community Foundation, the Durham County United Way, and the YMCA of Greater Charlotte.

9. I received the Harvey E. Beech Outstanding Alumni Award in 2003 and a Distinguished Service Medal Citation from the UNC-Chapel Hill General Alumni Association in 2005. In December 2015, I was awarded the Order of the Long Leaf Pine for extraordinary service to the State by the Governor of North Carolina.

My Experience at UNC-Chapel Hill

10. My experience at UNC-Chapel Hill was very different from any of my prior experiences, in part because I had not had much exposure to Whites, Asians, or other different ethnic groups.

11. During the first semester of my freshman year, I tried out for the football team. That experience helped ease my transition into college, in some ways, because a shared interest in the game naturally created a group of individuals with whom to associate. Football also helped ease my transition because I felt a sense of equality on the football field that, at first, I did not feel in the classroom. Regardless of race, we were out there on the field just trying to make the team. To that extent, we were equal.

12. I was less confident in the classroom than on the football field. Not only did I have doubts about the quality of my academic preparation, but I incorrectly assumed that all White people were geniuses. I intentionally placed myself in the back of the classroom. One day, however, I realized that I needed to approach my school work the way that I approached football. I told myself that if I were on the football field instead of in the classroom, I would be doing everything I could to earn a place in the starting lineup. I needed to do the same thing in class. After that realization, I began sitting in the front. There, I did not see the other geniuses. It seemed as though the professor was talking just to me.

13. My new approach worked. Once I gained my footing and confidence, I learned I could compete with anyone and be successful. That lesson remained with me

for the rest of my career. No matter what the situation was or who the other participants were, I knew I could succeed.

14. Another important turning point for me was the realization that all of my classmates were human, too. Maybe we had not come from the same place or from places with similar resources, but we all wanted to be successful and were concerned about passing exams and courses. In that sense, all of us on campus were in the same boat. Despite our differences, we all could talk about what a tough test our professor had just given. After this realization, I learned to be less suspicious, and I began interacting more extensively with my classmates. Understanding that we are all human has powerfully shaped my approach to life, to engagement, and to community service in a positive way.

15. A third important lesson I learned at UNC-Chapel Hill was that there is no single standard for success or excellence. It was eye-opening to see how different people put varying levels of effort into achieving success.

16. The diversity I encountered at UNC-Chapel Hill was transformative. I benefitted immeasurably from experiencing other cultures and from listening to others students' stories. In some instances, I also benefitted from hearing other students' parents talk about what had shaped them and helped them to succeed in business. I learned a lot about what is important in life, and I left UNC-Chapel Hill a very different person than I was when I arrived on campus.

The Impact of Diversity

17. Diversity is essential from a business perspective, as well as an educational one. In order to optimize the quality of a project and products we produce, we must have people who come from different perspectives. Early on in my career at Duke Energy, I thought I was stupid because the solutions to problems that I came up with in my mind were very different from everyone else's. I really wondered if I would make it. But one day, I dared to put my stupid idea out there, and it changed the conversation. I learned another big lesson then. I had caused people to sit back and think about something different. That became the basis for how I ran staff or board meetings. I compelled people to bring ideas to the table instead of sitting on the sidelines, because I knew that diversity of ideas made the product better. Diversity of ideas comes from having people around the table who have a diversity of experiences and perspectives.

18. Employers' interest in diversity is reflected in the increase in funding that corporate foundations are investing in K-12 diversity-related initiatives to stimulate talent pools. As an example, the most important project I have been involved with in my career is Project LIFT. Project LIFT is an initiative to address the achievement gap in Charlotte-Mecklenburg Schools. When I learned that West Charlotte High School ("West Charlotte") had a 51 percent graduation rate, it tore my heart. West Charlotte was my high school sports rival. I had seen West Charlotte ascend to national prominence and then sink when integration efforts stopped. Project LIFT is my effort to help students like me, who have grown up with few resources and low expectations. We raised \$55 million for underserved elementary, middle, and high schools in the Charlotte-

Mecklenburg school system. In four years the graduation rate has increased to 86 percent, and we expect to reach 90 percent in five years. It is critical that we not allow so much talent to sit on the sidelines. Ultimately, the entire State benefits from these students' success. The opportunities I had at UNC-Chapel Hill put me in a position to reach back and help others from backgrounds like mine.

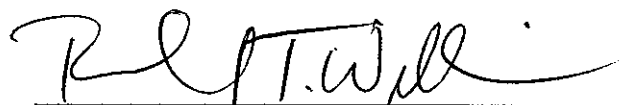
19. Similarly, the entire State benefits from programs like the Carolina Covenant, which attracts students to UNC-Chapel Hill who otherwise would not have considered attending or who would have been left with so much debt. It draws students like me—not necessarily Black students, but students who never would have imagined that they could attend or be successful at UNC-Chapel Hill. It has been incredible to see those students' success.

Conclusion

20. As General William Davie said when UNC-Chapel Hill was established, the purpose of a public university is to prepare the common man for service. Diversity, including racial diversity, is essential to that preparation. UNC-Chapel Hill simply cannot afford to leave its students' talent on the table.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

Executed on: 07/26/2017


Richard ("Stick") Williams